

**MEMO ENDORSED**

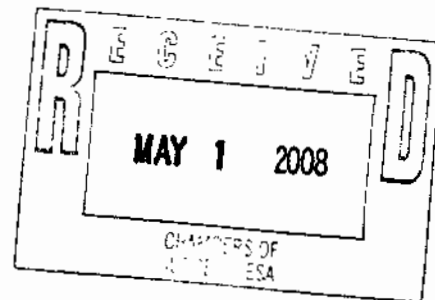
<b>USDC SDNY</b> <b>DOCUMENT</b> <b>ELECTRONICALLY FILED</b> <b>DOC #:</b> <b>DATE FILED:</b> 5/5/08	<b>U.S. Department of Justice</b>  United States Attorney Southern District of New York  86 Chambers Street, 3 <sup>rd</sup> Floor New York, New York 10007
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April 30, 2008

**VIA HAND DELIVERY**

Hon. Thomas P. Griesa  
 United States District Judge  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street, Room 1630  
 New York, New York 10007

Re: Haji v. United States, et al.  
 08 Civ. 2230 (TPG)



Dear Judge Griesa:

I write on behalf of Special Agents Robert Barrett, Kate Barnard, and Paul Buchanan, and the United States of America, Defendants in the above-referenced action, to request until June 13, 2008, to answer, move or otherwise respond to the complaint. Our office was served with the complaint on March 7, 2008, and all three Special Agents signed waivers of service which were sent on March 20, 2008, or April 4, 2008. Accordingly, the United States's response is due May 5, 2008, and the responses of the Special Agents are due either May 19, 2008, or June 3, 2008.

The aforementioned Special Agents have been sued in their individual capacities. All three Special Agents are with the Drug Enforcement Agency ("DEA"). At this time, all three Special Agents are in the process of preparing their requests for representation with the Department of Justice ("DOJ").

Accordingly, this Office is not authorized to represent the DEA Special Agents, but is appearing on their behalf for the limited purpose of seeking an extension of time to respond to the complaint. The Government respectfully requests this extension in order to afford the DEA Special Agents time to submit their respective requests to DOJ and allow DOJ time to make a determination. The requested extension will also enable this Office to submit a consolidated response on behalf of all Defendants that it represents.

This is the Government's first request for an extension. Counsel for Plaintiff consents to the request. Additionally, counsel for the City of New York also consents to the adjournment.

*Approved,*  
*Thomas P. Griesa*  
*USAG 5/5/08*

I thank the Court for its consideration of this request.

Respectfully,

MICHAEL J. GARCIA  
United States Attorney  
Southern District of New York

By:



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**Via Facsimile and First Class Mail**

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